

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Verisign, Inc.,

Plaintiff,

v.

XYZ.com, LLC and Daniel Negari,

Defendants.

Case No. 1:14-cv-01749 CMH-MSN

**DECLARATION OF DEREK LINKE IN SUPPORT OF DEFENDANTS' MOTIONS  
TO EXCLUDE EXPERT TESTIMONY (ECF 232, 233, 234, 235)**

I, Derek Linke, hereby declare:

1. I am counsel for defendants XYZ.com, LLC and Daniel Negari ("Defendants"), over the age of 18, and competent to testify in this action.

2. I submit this declaration in support of Defendants' motions to exclude expert testimony of Plaintiff's experts Michael B. Mazis (ECF 232), Lauren B. Kindler (ECF 233), Andrew Simpson (ECF 234), and Mark L. Berenblut (ECF 235).

3. Attached as **Exhibit A** is a true and correct copy of the July 3, 2015 Expert Report of Lauren R. Kindler.

4. Attached as **Exhibit B** is a true and correct copy of the August 12, 2015 Rebuttal Expert Report of Lauren R. Kindler.

5. Attached as **Exhibit C** is a true and correct copy of the July 3, 2015 Expert Report of Mark L. Berenblut.

6. Attached as **Exhibit D** is a true and correct copy of the August 12, 2015 Reply Expert Report of Mark L. Berenblut.

7. Attached as **Exhibit E** is a true and correct copy of the June 26, 2015 Expert Report of Michael B. Mazis.

8. Attached as **Exhibit F** is a true and correct copy of the August 12, 2015 Rebuttal Expert Report of Michael B. Mazis.

9. Attached as **Exhibit G** is a true and correct copy of the July 3, 2015 Expert Report of Andrew Simpson.

10. Attached as **Exhibit H** is a true and correct copy of the August 12, 2015 Reply Expert Report of Andrew Simpson.

11. Attached as **Exhibit I** is a true and correct copy of the August 1, 2015 Expert Report of Hal Poret.

12. Attached as **Exhibit J** is a true and correct copy of the August 1, 2015 Expert Report of Samuel J. Hewitt, CPA.

13. Attached as **Exhibit K** is a true and correct copy of the August 1, 2015 Rebuttal Expert Report of Jothan Frakes.

14. Attached as **Exhibit L** is a true and correct copy of the July 31, 2015 Rebuttal Expert Report of Thies Lindenthal, Ph.D.

15. Attached as **Exhibit M** is a true and correct copy of excerpts from the transcript of the July 21, 2015 deposition of Lauren R. Kindler.

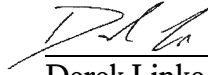
16. Attached as **Exhibit N** is a true and correct copy of excerpts from the transcript of the July 30, 2015 deposition of Andrew Simpson.

17. Attached as **Exhibit O** is a true and correct copy of excerpts from the transcript of the July 28, 2015 deposition of Mark L. Berenblut.

18. Attached as **Exhibit P** is a true and correct copy of excerpts from the transcript of the July 27, 2015 deposition of Michael B. Mazis.

I certify and declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed August 28, 2015 at Seattle, Washington.

  
\_\_\_\_\_  
Derek Linke

### **CERTIFICATE OF SERVICE**

I certify that on August 28, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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